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October 19, 2010

Julius Genachowski
FEDERAL COMMUNICATIONS COMMISSION
445 12th Street SW
Washington, DC 20554

Re: Connect America Fund – WC Docket No. 10-90
A National Broadband Plan for Our Future – GN Docket No. 09-51
High-Cost Universal Service Support – WC Docket No. 05-337

Dear Chairman Genachowski:

After reviewing the Reply Comments of the Iowa Utilities Board (IUB) in this docket, the Rural Iowa Independent Telephone Association (RIITA) believes an additional response is necessary to Comment Number 1, appearing on page 5.

In addressing the Connect America Fund (CAF), the IUB first noted that eliminating waste, fraud and abuse “will free money for legitimate purposes and the expansion of the nation’s broadband services.” RIITA agrees with the IUB that no fund should be used in a way that creates waste, fraud or abuse. However, the IUB addresses the issue in the context of what it calls access pumping. The IUB refers to its own reports and suspicion of abuse regarding one competitive local exchange carrier (CLEC) that is receiving high-cost support. While CLECs are not eligible for membership in RIITA and we do not defend fraud or unethical behavior, in this context, it is extremely unfortunate that the IUB would focus on the activities of one CLEC in commenting on Universal Service or the proposed CAF for at least five reasons.

First, the issue of increases in access fee payments do not relate directly to eligibility for Universal Service Funds. The IUB makes no attempt to explain how the issue relating to this one CLEC should alter an approach to meeting the Commission’s obligations under the present Telecommunications

Act, much less why it should be a primary consideration in designing a new fund or providing broadband access. Many high-cost companies have been offering affordable telephone service for years to people who would not be provided service without the Universal Service Fund. RIITA, like other associations representing rural independent carriers, participated in dockets at the state and federal level urging that the Universal Service Fund be limited to that purpose. We resisted both expansion of the fund to wireless carriers who operated in different service areas and repeatedly recommended elimination of the identical support rule. The IUB's comments show a marked lack of understanding regarding the issue of high-cost telecommunications services and confuse the issues of access and universal service.

Second, the term "access pumping" has been adopted primarily by interexchange carriers and applied to a number of different situations, some of which are legitimate increases in business. Using an argumentative term in comments to the Commission by another regulatory agency is unfortunate and vague.

Third, the IUB's focus on increases in access payments completely misstates the nature of the dockets it has handled in Iowa. Only a handful of companies have been involved in these dockets out of close to one hundred and fifty independents serving the state. Even the companies involved have total access charges that constitute a small percentage of the interexchange carriers' traffic and access fee payments. Some proportionality must be maintained in designing a universal fund system. Relying on one complaint about the type of revenues one CLEC is receiving is disproportionate to what is happening in the State of Iowa.

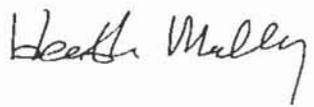
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Finally, even the IUB's statement regarding free conferencing services assumes that providing conferencing services is somehow improper, something this Commission has repeatedly said is not true. Conferencing services have been offered by numerous companies, including interexchange carriers, at various rates and with various enhancements for decades. It is a mistake to lump those services together under one category and use those services to argue for Universal Service Fund changes.

RIITA notes that it fully joined in comments filed by the National Telecommunications Cooperative Association, the Organization for the Promotion and Advancement of Small Telecommunications Companies, the National Exchange Carriers Association and numerous state telecommunications associations. RIITA continues to support and agree with those comments, but is concerned that reply comments of the IUB misstate the issues involved in this docket and adds these ex parte comments on its own.

Sincerely,

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Heath Mallory
RIITA President



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Robert M. McDowell
FEDERAL COMMUNICATIONS COMMISSION
445 12th Street SW
Washington, DC 20554

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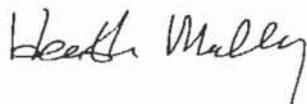
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Heath Mallory

RIITA President



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October 19, 2010

Michael J. Copps
FEDERAL COMMUNICATIONS COMMISSION
445 12th Street SW
Washington, DC 20554

Re: Connect America Fund – WC Docket No. 10-90
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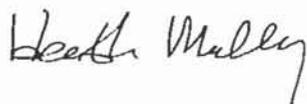
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Heath Mallory

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October 19, 2010

Mignon Clyburn
FEDERAL COMMUNICATIONS COMMISSION
445 12th Street SW
Washington, DC 20554

Re: Connect America Fund – WC Docket No. 10-90
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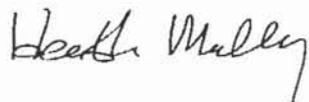
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Meredith Attwell Baker
FEDERAL COMMUNICATIONS COMMISSION
445 12th Street SW
Washington, DC 20554

Re: Connect America Fund – WC Docket No. 10-90
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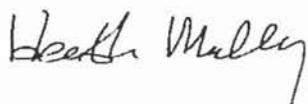
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